IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION

Kevin Turner and Shawn Wooden, on behalf of themselves and others similarly situated,

Plaintiffs, and

Richard Dent, Jeremy Newberry, Roy Green, J.D. Hill, Keith Van Horne, Ron Stone, Ron Pritchard, James McMahon, and Marcellus Wiley, on behalf of themselves and other similarly situated,

Proposed Intervenor-Plaintiffs

v.

National Football League and NFL Properties LLC, successor-in-interest to NFL Properties, Inc.

Defendants.

THIS DOCUMENT RELATES TO: ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

MOTION FOR LEAVE TO FILE REPLY MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Proposed Intervenor-Plaintiffs Richard Dent, Jeremy Newberry, Roy Green, J.D. Hill, Keith Van Horne, Ron Stone, Ron Pritchard, James McMahon and Marcellus Wiley, by and through undersigned counsel, respectfully request this Court grant leave to file the attached Reply, and state as follows:

1. On August 13, 2014, Proposed Intervenor-Plaintiffs filed their Motion to

Intervene. ECF 6131.

2. On September 2, 2014 both Class Plaintiff and NFL Defendants filed Responses in Opposition Thereto. ECF 6145, ECF 6139.

3. Proposed Intervenor-Plaintiffs now request leave to file the attached Reply to address and respond to Class Plaintiff and NFL Defendants' Responses.

WHEREFORE, Proposed Intervenor-Plaintiffs Richard Dent, Jeremy Newberry, Roy Green, J.D. Hill, Keith Van Horne, Ron Stone, Ron Pritchard, James McMahon and Marcellus Wiley, by and through undersigned counsel, respectfully request this Court grant leave to file the attached Reply to Class Plaintiffs.

Respectfully submitted,

Date: September 10, 2014

/s/

Ramsay M. Whitworth Esq. (Fed. Bar No. 85208) rwhitworth@mdattorney.com
Stephen G. Grygiel (Admitted *Pro Hac Vice*) sgrygiel@mdattorney.com
William N. Sinclair (Admitted *Pro Hac Vice*) bsinclair@mdattorney.com
SILVERMAN|THOMPSON|SLUTKIN|WHITE|LLC
201 North Charles Street, Suite 2600
Baltimore, Maryland 21201

Tel: (410) 385-2225 Fax: (410) 547-2432

Stuart A. Davidson (Admitted *Pro Hac Vice*) SDavidson@rgrdlaw.com
Mark J. Dearman (Admitted *Pro Hac Vice*)
MDearman@rgrdlaw.com
Robbins Geller Rudman & Dowd LLP
120 E. Palmetto Park Road, Suite 500
Boca Raton, Florida 33432

Tel: (561) 750-3000 Fax: (561) 750-3364

Attorneys for Dent Plaintiffs